

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 20-154 WMW/TNL

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2252(a)(1)

18 U.S.C. § 2252(a)(4)(B)

v.

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2252(b)(2)

ROBERT LAWRENCE STACE,

18 U.S.C. § 2253

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

**BACKGROUND**

On or about February 24, 2020, in the State and District of Minnesota, the defendant, **ROBERT LAWRENCE STACE**, knowingly and intentionally possessed in an electronic format approximately 1,961 files of minors engaging in sexually explicit conduct. In addition, **ROBERT LAWRENCE STACE** used email accounts, MP3 players, flash media players, and hard drives to download, store and send himself and others child pornography files.

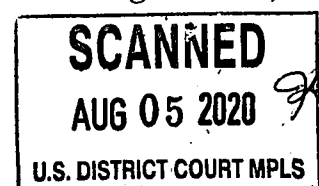
**COUNT 1**

(Transportation of Child Pornography)

On or about February 7, 2020, in the State and District of Minnesota, the defendant,

**ROBERT LAWRENCE STACE,**

having been previously convicted under the laws of the State of Minnesota relating to aggravated sexual abuse, sexual abuse, and abusive sexual conduct involving a minor,



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namely, a conviction on or about November 12, 2003, in Hennepin County District Court, for Criminal Sexual Conduct—First Degree-Penetration and a conviction on or about April 7, 2017, in Hennepin County District Court, for Possess Pornographic Work by Registered Predatory Offender, did knowingly transport visual depictions using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, the following video files:

- a) **2007 NEW GIRL IMG 0167.wmv**, a video that shows a shirtless prepubescent female performing oral sex on an adult male; and
- b) **NattyDatty - Playing before a shower.avi**, a video that shows a nude prepubescent girl in a bathtub. The male camera operator reaches into view and touches the child's buttocks. At the end of the video, he touches his erect penis to the child's buttocks;

all in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

**COUNT 2**

(Transportation of Child Pornography)

On or about February 10, 2020, in the State and District of Minnesota, the defendant,

**ROBERT LAWRENCE STACE,**

having been previously convicted under the laws of the State of Minnesota relating to aggravated sexual abuse, sexual abuse, and abusive sexual conduct involving a minor, namely, a conviction on or about November 12, 2003, in Hennepin County District

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Court, for Criminal Sexual Conduct- First Degree-Penetration and a conviction on or about April 7, 2017, in Hennepin County District Court, for Possess Pornographic Work by Registered Predatory Offender, did knowingly transport visual depictions using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including but not limited to the following files:

- a) **Pussy\_fuck\_no12.mp4**, a video that shows a nude prepubescent girl, lying on her back. On her abdomen is written, "FUCK ME" with an arrow pointing towards her genitalia. During the video, an adult male is rubbing his erect penis on the girl's labia and clitoris and appears to penetrate her vagina;
- b) **fd.jpg**, a digital image showing the pelvis and genital area of a nude prepubescent girl. The pictures shows an adult male inserting his penis into the child's anus;
- c) **! 0 lucy.7yo.fucked,1.WMV**, a video that runs for 8 minutes 45 seconds. The video shows an adult male touching the chest of a prepubescent girl. He later rubs his penis on her genitalia, performs oral sex on her, then masturbates and ejaculates on her; and
- d) **13.jpg**, a digital image of a nude prepubescent girl. The girl is lying on her back on a table and her legs are spread apart towards the camera. Her genitalia is exposed to the camera. The girl's wrists and ankles are bound with rope and she also has rope in her mouth;

all in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

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**COUNT 3**  
(Possession of Child Pornography)

On or about February 24, 2020, in the State and District of Minnesota, the defendant,

**ROBERT LAWRENCE STACE,**

having been previously convicted under the laws of the State of Minnesota relating to aggravated sexual abuse, sexual abuse, and abusive sexual conduct involving a minor, namely, a conviction on or about November 12, 2003, in Hennepin County District Court, for Criminal Sexual Conduct- First Degree-Penetration and a conviction on or about April 7, 2017, in Hennepin County District Court, for Possess Pornographic Work by Registered Predatory Offender, did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce, including by computer, and in and affecting interstate and foreign commerce, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image files:

- a) **bfg.jpg**, a digital image showing a nude prepubescent girl lying on her back on a hotel bed. The child's legs are elevated and spread apart. A nude adult male appears to be anally penetrating the child with his penis;
- b) **10.jpg**, a digital image showing a nude prepubescent girl who is performing oral sex on an adult male;

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

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### **FORFEITURE ALLEGATIONS**

Counts 1-3 are hereby realleged and incorporated to allege forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of any of the foregoing offenses, the defendant,

**ROBERT LAWRENCE STACE,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter that contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including but not limited to a Blue Eclipse 8GB MP3 Player bearing serial number UD07S370 and a Kingston 120GB Hard Drive bearing serial number 0026B774901FADD.

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If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON